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VIA ECF AND EMAIL

The Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: ***Lara S. Trafelet v. Cipolla & Co., LLC, No. 22-cv-4888 (AT) (VF)***

Dear Judge Torres:

We represent Petitioner Lara S. Trafelet in the above-referenced matter. We are writing in furtherance of our November 14 letter (ECF No. 54) to seek the Court's immediate assistance to restrict public access to certain additional documents Respondent filed (*see* Appendices A and B). Upon further review, these documents contain [REDACTED]

[REDACTED] Once restricted, we respectfully request that the Court order the Respondent to (i) file the exhibits listed in Appendix A fully under seal; and (ii) file redacted versions of the exhibits and documents listed in Appendix B, in accordance with the (limited) redactions that Ms. Trafelet has proposed in Exhibits A through N to this letter.

As noted in our November 14 letter, Ms. Trafelet has undertaken a review of Respondent's filings to ensure that [REDACTED]

[REDACTED] She appreciates the Court's prompt assistance in response to that letter. Ms. Trafelet has now completed her review of Respondent's 108 exhibits and other redacted filings and respectfully requests further relief from the Court.¹

¹ Ms. Trafelet undertook the review, at her own expense, of all of Respondent's filings, totaling several thousand pages, despite the fact that the burden should have been on Respondent to review its own filings [REDACTED]

[REDACTED] Respondent has neither alerted this Court nor Ms. Trafelet to further violations, which remain accessible to the public. Should any harm materialize from the public

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First, Ms. Trafelet has identified several *additional* violations of [REDACTED]

[REDACTED] Ms. Trafelet requests that this Court restrict access to these two filings and order Respondent to remedy this issue. Ms. Trafelet attaches here, as Exhibits A and B to this letter, proposed redacted versions of these two documents, [REDACTED]

[REDACTED] Given that Respondent has not taken any affirmative steps to ensure that there are no other violations in its filings, Ms. Trafelet respectfully requests that Respondent be ordered to review and confirm with the Court that [REDACTED] do not appear in any of its other filings.

Second, Ms. Trafelet has identified an additional set of exhibits that contain [REDACTED]

[REDACTED] Given the substantial privacy interest of [REDACTED], and the very limited public interest in this information, *see United States v. Amodeo*, 71 F.3d 1044, 1051 (2d Cir. 1995), she requests that the information be shielded from public view. For documents where this information pervades the entire document, Ms. Trafelet respectfully requests that those documents be filed fully under seal. (*See* Appendix A.) For documents where this information is easily redacted, Ms. Trafelet requests that the documents be redacted and re-filed by Respondent, in accordance with the proposed redactions Ms. Trafelet has highlighted in Exhibits A through N, filed herewith. (*See* Appendix B and Exs. A through N to this letter.) Had Ms. Trafelet known in advance that Respondent planned to file publicly all of these exhibits, she would have moved for a protective order.

Ms. Trafelet reserves all rights to seek further relief, given the extensive nature of Respondent's violations of [REDACTED] and the sheer volume of

disclosure of [REDACTED] she will seek to hold Respondent fully accountable.

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documents Respondent filed [REDACTED]. She sincerely appreciates the Court's prompt attention to this matter.

We are available should Your Honor have any questions.

Respectfully submitted,

/s/ Jenna E. Ross

Jenna E. Ross
Jenner & Block LLP
Counsel for Petitioner Lara S. Trafelet

cc: Counsel for Respondent (via ECF and email)

GRANTED. The Clerk of Court is directed to modify the viewing level of the following documents to allow only the parties to access them: ECF Nos. 41, 42, 43, 45-03, 45-04, 45-07, 45-08, 45-23, 45-25, 45-26, 45-30, 45-33, 45-34, 45-35, 45-36, 45-39, 45-44, 45-45, 45-49, 45-51, 45-62, 45-68, 45-76, 45-81, 50-09, 50-10, 50-15, 50-17, 50-18, 50-19, 50-22, 50-25.

Further:

1. Respondent is directed to file under seal the exhibits identified by Petitioner in Appendix A to Petitioner's letter motion at ECF No. 56.
2. Respondent shall also file redacted versions of the exhibits and documents identified by Petitioner in Appendix B to Petitioner's letter motion at ECF No. 56, in accordance with the redactions Petitioner proposed in Exhibits A through N to Petitioner's letter motion at ECF No. 56.
3. Respondent is directed to review its filings and confirm with the Court by **November 23, 2022**, that the sensitive information identified by Petitioner does not appear in any of its other filings.

SO ORDERED.

Dated: November 18, 2022
New York, New York



ANALISA TORRES
United States District Judge